

201-14505

PCRM P H Y S I C I A N S
C O M M I T T E E 5100 WISCONSIN AVENUE, N.W., SUITE 400
F O R WASHINGTON, DC 20016
R E S P O N S I B L E T: (202) 686-2210 F: (202) 686-2216
M E D I C I N E PCRM@PCRM.ORG WWW.PCRM.ORG

May 27, 2003

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

RECEIVED
OPPT CBIC
2003 MAY 30 AM 9:39

Subject: Comments on the HPV Test Plan for Linear and Branched Alkylbenzene Sulfonic Acids (LAS/ABS) and Derivatives

Dear Administrator Whitman:

The following comments on The LAS/ABS Consortium; The Soap and Detergent Association's test plan for Linear and Branched Alkylbenzene Sulfonic Acids and Derivatives are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

The LAS/ABS Consortium submitted its test plan on January 28, 2003 for six structurally and behaviorally related chemicals; Benzenesulfonic acid, dodecyl-, compd. with 2-propanamine (1:1) (CAS No. 26264-05-1, 68584-24-7 and 90218-35-2), Benzenesulfonic acid, dodecyl-, compd. with 2,2',2''-nitrilotris [ethanol] (1:1) (CAS No. 27323-41-7, 68411-31-4 and 70528-84-6), Benzenesulfonic acid, dodecyl-, calcium salt (CAS No. 26264-06-2), Benzenesulfonic acid, dodecyl-, branched (CAS No. 68411-32-5), Benzenesulfonic acid, mono-C11-13-branched alkyl derivatives (CAS No. 68608-88-8), and Benzenesulfonic acid, mono-C11-13-branched alkyl derivatives, calcium salts (CAS No. 68953-96-8). These six chemicals are used in cleaning products for home, institutional and industrial use to lower the surface tension of water. Consumer products usually contain a LAS/ABS mixture of 5-30% and commercial products usually contain a LAS/ABS mixture of 60-90%. The LAS/ABS Consortium has submitted an initial report while it awaits additional information to further support data for these six chemicals. This test plan combines six chemicals into one category to make use of existing data and incorporates read-across data to meet the SIDS endpoints for these chemicals.

We applaud The LAS/ABS Consortium's efforts and concur that pending data for two supporting chemicals will generate useful read-across data to further support the six chemicals in the Linear and Branched Alkylbenzene Sulfonic Acids category. At

present, no additional testing is proposed; an approach that is consistent with EPA's stated goal of maximizing the use of existing data in order to limit additional animal testing. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at meven@pcrm.org.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research